

STATE OF OHIO

COUNTY OF CUYAHOGA

AFFIDAVIT OF JAMES A. CLIMER

Now comes James A. Climer, who being first duly sworn according to law, deposes and states the following:

1. Affiant is counsel of record for Defendants City of University Heights and Michael Dylan Brennan in Case Number 1:22-cv-01594, in the United States District Court, Northern District of Ohio.

2. Affiant states the Complaint in this case makes wide-ranging and detailed allegations of fact that require a detailed review with numerous witnesses, which has been precluded by trial obligations of the undersigned.

3. Affiant further states that the Motion for Enlargement of Time to which this Affidavit is appended is interposed not for purposes of harassment or delay, but in furtherance of the interests of justice to permit full consultation with said Defendants in order to frame a proper response to the Complaint filed in this action. This request derives from the sincere desire to fully research and prepare a response to the complaint while balancing other professional obligations.

4. The foregoing is based upon Affiant's personal knowledge unless otherwise designated.

FURTHER AFFIANT SAYETH NAUGHT.


JAMES A. CLIMER

SWORN TO BEFORE ME, and subscribed in my presence on November 2,
2022.


NOTARY PUBLIC



KARYN CULVER
Notary Public - State Of Ohio
My Commission Expires 12-2-2023